

COOLEY LLP  
Heidi Keefe (178960)  
(hkeefe@cooley.com)  
Lowell Mead (223989)  
(lmead@cooley.com)  
Dena Chen (286452)  
(dchen@cooley.com)  
Matthew J. Brigham (191428)  
(mbrigham@cooley.com)  
Priya B. Viswanath (238089)  
(pviswanath@cooley.com)  
3175 Hanover Street  
Palo Alto, California 94304  
Telephone: (650) 843-5000  
Facsimile: (650) 849-7400

COOLEY LLP  
Phillip Morton (*Pro Hac Vice*)  
(pmorton@cooley.com)  
1299 Pennsylvania Avenue  
NW, Suite 700  
Washington, DC 20004-2400  
Telephone: (202) 842-7800  
Facsimile: (202) 842-7899

*Attorneys for Defendant*  
Apple Inc.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (lead case)  
Case No. 5:18-cv-02555-JD

**DECLARATION OF LOWELL MEAD IN  
SUPPORT OF DEFENDANT'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

I, Lowell Mead, declare:

1. I am an attorney with Cooley LLP and counsel in this action for Defendant Apple Inc. (“Apple”). I submit this declaration in support of Apple’s Support for Administrative Motion to File Under Seal.

2. The information sought to be sealed is narrowly tailored:

Materials Sought to be Sealed	Sealing Request
Unredacted version of Exhibit D, constituting excerpts of the Expert Report of Dr. John C. Hart Regarding Infringement of Certain Claims of U.S. Patent No. 9,185,291 by Apple Inc. (the “ <b>Hart Report</b> ”)	Narrowly tailored portion of expert report describing highly confidential technical information about source code and other technical details of hardware and software components.

3. The redacted information was produced and designated as “Confidential – Attorneys’ Eyes Only” by Apple under the Protective Order (Dkt. 77). Specifically, based on my experience working on behalf of Apple on numerous technical matters including the present matter, I understand that the information that Apple seeks the Court’s permission to file under seal relates to the internal operations of Apple’s camera source code and related technical details of internal hardware and software components inside Apple’s commercial products. I understand that these internal operations are proprietary, highly confidential technical items of information that have been developed through extensive research and development, and provide a competitive advantage in Apple’s products. Compelling reasons and good cause exist to permit Apple to file that information under seal, as public disclosure would harm Apple as it would permit competitors to learn and copy Apple’s proprietary technical details and unfairly compete in the marketplace. The information sought to be sealed is narrowly tailored to address only the highly confidential information.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 25, 2024 in Palo Alto, CA.

/s/ Lowell Mead

Lowell Mead

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